

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
ORANGE COUNTY
SOCIAL SERVICES AGENCY
Conducted August 11-15, 2008**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
714 P Street, M.S. 6-70
Sacramento, CA 95814
(916) 654-2107**

**Reviewer:
Jaime Urquizo**

TABLE OF CONTENTS

- I. INTRODUCTION**
- II. SUMMARY OF METHODOLOGY**
- III. DISSEMINATION OF INFORMATION**
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**
- V. PHOTOGRAPHS**
- VI. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**
- VII. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**
- VIII. STAFF DEVELOPMENT AND TRAINING**
- IX. DISCRIMINATION COMPLAINT PROCEDURES**
- X. CONCLUSION**

CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Orange County Social Services Agency with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on August 11-15, 2008 with an introductory meeting held with Patty Briones, Civil Rights Coordinator. An exit interview was held with Patty Briones on August 15, 2008 to review the findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
South Region & Arbor Education and Training	23330 Moulton Parkway Laguna Hills, CA 92653	FNS follow up	
Aliso Viejo Regional Center	115 Columbia Aliso Viejo, CA 92656	-Medi-Cal -Food Stamps (NAFS) -CFS	21.7 - Spanish
Adult Services Main Office	1505 E. Warner Avenue Santa Ana, CA 92705	-Special Services -Adult Services	6.3 - Spanish
Braden Court Office County District Office	1337 Braden Court Orange, CA 92866	-Children & Family Services -Domestic Violence -Emergency Response -Child Abuse Services Team	26.4 - Spanish
West Region County Facility	6100 Chip Avenue Cypress, CA 90630	-Calworks -Food Stamps -Welfare to Work	23.1 - Vietnamese 8.8 - Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2008 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Total Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	5	3
Employment Assessment & Training Workers	3	2
Adult Program Workers	7	3
Receptionist/Screeners	4	3
Total	19	11

Total Program Manager Surveys

Number of surveys distributed	5
Number of surveys received	5

Total Reviewed Case Files

English speakers' case files reviewed	29
Non-English or limited-English speakers' case files reviewed	61
Languages of clients' cases	Spanish, Vietnamese, Cantonese, Armenian, Farsi, Korean, Russian, Mandarin, Burmese.

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Sometimes	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			
Does the county have extended hours to accommodate clients?		X		Moulton, Chip, and Columbia – applications accepted until 3:00. Warner accepts apps until 5:00.
Can applicants access services when they cannot go to the office?	X			Accessibility is by telephone and Internet.

Does the county ensure the awareness of available services for individuals in remote areas?			X	Moulton does not. All other offices provide services via the Internet, brochures at health fairs, and other public venues.
---	--	--	---	---

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)? Is the pamphlet distributed and explained to each client at intake and re-certification?	X X			
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?			X	All offices had Pub 13 in threshold languages, but not all offices had all 14 languages available.
Was the Pub 13 available in large print, audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			Staff members interviewed were aware of who the CRC was - Patty Briones.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?		X		Moulton – signs not in threshold languages: "PLEASE CHECK AT RECEPTION"

Signage, posters, pamphlets	Yes	No	Some-times	Comments
		X		"RESOURCE CENTER"
		X		"RECEPTION"
				Warner -- Signs not in Threshold Languages:
		X		"Business Hours"
		X		"Push to Exit"
		X		"House Phone"
		X		"Adult Services"
		X		"Automatic Caution Door"
		X		"Door to Remain Unlocked When Bldg is Occupied"
				Braden Court – Signs Not in Threshold language
				Entry way: Signs
		X		"Children and Family Services"
		X		"Business Hours"
		X		"C.A.S.T."
		X		"Automatic Caution Door"
		X		"Activate Switch to Open"

Signage, posters, pamphlets	Yes	No	Some-times	Comments
		X		"Push to Operate"
		X		(Low Energy Power Operated Door sign -- needs replacement)
				1st Floor Lobby Signs:
		X		"Reception"
		X		"House Phone"
		X		"Parent Conference"
		X		"Breakroom"
		X		"Stairs – Evacuation Plan – Emergency Telephone Number: 911 – In Case of Fire Do Not Use Elevators, Use Stairways"
				2nd Floor Lobby Signs:
		X		"Parent Interview"
		X		"No Food or Drink"
		X		"Satisfaction Survey"
				Chip Ave – Signs Not in Threshold language
		X		"Automatic Caution Door - Two way Traffic"

Signage, posters, pamphlets	Yes	No	Some-times	Comments
				Lobby Signs
		X		"In House Telephone"
		X		"CalWORKS Employment Center"
		X		"No Food No Drinks" (grey sign)
		X		"Interview Room"
		X		"No Food No Drink" (Color sign)
		X		"110A Fingerprint Room" (room sign)
		X		"102 Orientation Room"
		X		"Orientation Schedule"
		X		"Emergency Exit Only"
		X		"Arbor Education & Training Center – Network Center"
		X		"If you are running late, please enter around the other side"
		X		"Please Silence Cell Phones"
		X		"Arbor Education & Training Center – Gateway Workshop"
		X		"125 Job Club"
		X		"127 Resource Center"

Signage, posters, pamphlets	Yes	No	Some-times	Comments
		X		"Phones are for Job Search <u>Only</u> Personal Calls Are Not Permitted"
		X		"Arbor Education & Training Center – VantEdge Workshop"
		X		"128 Job Club"
		X		"Job Leads"
		X		"Hot Jobs"
		X		"Please do not use computer. It is not functioning properly"
		X		"Computers are for Job Search-related purposes only. Thank you"
		X		"Please Sign In & Sign Out"
		X		"Resource Center"

Informational Element	Corrective Action Required
Directional signage	Orange County shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. Div. 21-107.212 and .24

C. Recommendation

The most recent version for each of the above referenced documents is:

Pub 13 “Your Rights under California Welfare Programs” 03/07

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website

http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

A1. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 23330 MOULTON PARKWAY

Facility Element	Findings	Corrective Action
Parking	2 Van-accessible identified spots, closest to building do not have van accessible signs.	Van-accessible spaces shall have a sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space. (CA T24 1129B.5, ADA 4.6.4) p. 133.
Route to Main Door	Right and Left pathway ramps from Van-Accessible parking spots are 47" wide instead of 48".	Walks and sidewalks subject to these regulations shall have a continuous surface, not interrupted by steps or by abrupt changes in level exceeding ½ inch and shall be a minimum of 48" in width. Surfaces shall be slip resistant. (CA T24 1133B.7.1) p. 160.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 115 COLUMBIA, ALISO VIEJO, CA

Facility Element	Findings	Corrective Action
Parking	Freestanding sign was too low at 75".	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p. 133.
Client lobby	Various Informational-Directional signs were not in Threshold Language. (see photos).	Regulation Div 21.107-212.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 1505 E. WARNER, SANTA ANA, CA

Facility Element	Findings	Corrective Action
Parking	<p>A clearance access aisle on passenger side of van space is blocked by a building structural column. (3rd Disabled parking spot from the left side, facing the building).</p> <p>Signage on pavement depicting a wheelchair w/occupant needs to be repainted.</p>	<p>One in every 8 accessible spaces (p 136) and no less than 1 shall be served by an access aisle 96" wide minimum placed opposite the driver's side and shall be designated Van-Accessible. (CA T24 1129.B.4.2, ADA 4.1.2(5)(b)) p. 135.</p> <p>Pavement signage shall be 36" x 36" minimum, white on --blue in color, visible and centered. (CA T24 1129B.5.1 & 2) p. 133</p>
Route to Main Door	<p>A sidewalk obstruction is visible on the access aisle in front of the building. Two (2) bushes need to be cut back from the building to eliminate obstruction of travel.</p> <p>The ramp leading to the front of the building needs to have railings on each side. Railings were not available on the left side going up the ramp.</p>	<p>Walkways minimum width is 48". (CA T24 1133B.7.1)</p> <p>If a ramp run has a rise greater than 6" or a horizontal project greater than 6', then it shall have handrails on both sides. (CA T24 1133B.5.5.1, ADA 4.8.5</p>
Main or Alternate Entrance	<p>There was no directional sign directing clients to the main entrance from the furthest location in the parking lot structure.</p>	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353</p>

	Force to open doors excessive at 11 lbs (left door) and 12 lbs. (right door).	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
Directional and Informational Signage	<p>Various Informational-Directional signs were not in Threshold Language. (see photos).</p> <p>“Business Hours”</p> <p>“Push to Exit”</p> <p>“House Phone”</p> <p>“Adult Services”</p> <p>“Automatic Caution Door”</p> <p>“Door to Remain Unlocked When Bldg is Occupied</p> <p>Interview Room sign not in Threshold language.</p>	Div 21.107-212
Men’s Restroom	Men’s Restroom Door Force to open door excessive at 7 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
Women’s Restroom	Women’s Restroom Door Force to open door excessive at 8 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 1337 W. BRADEN COURT, ORANGE, CA

Facility Element	Findings	Corrective Action
Parking	<p>One free standing sign height was at 59." (must be at 80").</p> <p>Signage on pavement (depicting wheelchair with occupant) needs to be repainted.</p>	<p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p. 133</p> <p>Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.5.1 & 2) p. 133</p>
Main or Alternate Entrance	<p>Accessible disabled signage sign on door needs to be replaced.</p> <p>Force to open doors excessive at 9 lbs (left door) and 10 lbs. (right door).</p> <p>The Parent Conference Force to open door excessive at 8 lbs.</p>	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353</p> <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p.195</p>
Directional and Informational Signage	<p>Numerous Informational-Directional signs were not in Threshold Language. (see photos).</p> <p><u>Entry way: Signs</u></p> <p>"Children and Family Services"</p> <p>"Business Hours"</p> <p>"C.A.S.T."</p>	<p><u>Div 21.107-212</u></p>

	<p>"Automatic Caution Door"</p> <p>"Activate Switch to Open"</p> <p>"Push to Operate"</p> <p>(Low Energy Power Operated Door sign -- needs replacement)</p> <p><u>1st Floor Lobby Signs:</u></p> <p>"Reception"</p> <p>"House Phone"</p> <p>"Parent Conference"</p> <p>"Breakroom"</p> <p>"Stairs – Evacuation Plan – Emergency Telephone Number: 911 – In Case of Fire Do Not Use Elevators, Use Stairways"</p> <p><u>2nd Floor Lobby Signs:</u></p> <p>"Parent Interview"</p> <p>"No Food or Drink"</p> <p>"Satisfaction Survey"</p>	
Men's Restroom	Men's Restroom Door, Force to open door excessive at 8 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195

	<p>Toilet protector height is too high at 43.5".</p> <p>Toilet tissue dispenser is 23" from the front edge of the toilet.</p>	<p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p. 269</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp 275, 269</p>
Women's Restroom	<p>Women's Restroom Door Force to open door excessive at 6 lbs.</p> <p>Toilet protector height is too high at 43".</p> <p>Toilet tissue dispenser is located 19" from the front edge of the toilet.</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(b)) p. 195</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p. 269</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp. 275, 269</p>

A4. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 6100 CHIP AVE, ORANGE, CA.

Facility Element	Findings	Corrective Action
Parking	<p>Two (2) Freestanding signs were too low at 77" in height.</p> <p>Persons with disability are forced to go behind cars to reach the front entry. (2 spots on the side of the building).</p> <p>Parking spots on the side of the building are not located as close as possible to entrance.</p>	<p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p. 133</p> <p>Persons with disabilities shall not be forced to go behind parked cars except their own. (CA T24 1129B.4.3) (<i>hardship exception, p. 136</i>)</p> <p>Located on shortest accessible route. (CA T24 1129B.1.2, ADA 4.3.2(1)) p. 131</p>
Directional and Informational Signage	<p>Numerous Informational-Directional signs were not in Threshold Language. (see photos).</p> <p>"Automatic Caution Door - Two way Traffic"</p> <p>"In House Telephone"</p> <p>"CalWORKS Employment Center"</p> <p>"No Food No Drinks" (grey sign)</p> <p>"Interview Room"</p> <p>"Orientation Schedule"</p> <p>"Arbor Education & Training Center – Network Center"</p> <p>"If you are running late, please enter around the other side"</p>	Div 21.107-212

	<p>"Please Silence Cell Phones"</p> <p>"Arbor Education & Training Center – Gateway Workshop"</p> <p>"125 Job Club"</p> <p>"127 Resource Center"</p> <p>"Phones are for Job Search <u>Only</u> Personal Calls Are Not Permitted"</p> <p>"Arbor Education & Training Center – VantEdge Workshop"</p> <p>"128 Job Club"</p> <p>"Job Leads"</p> <p>"Hot Jobs"</p> <p>"Please do not use computer. It is not functioning properly"</p> <p>"Computers are for Job Search-related purposes only. Thank you"</p> <p>"Please Sign In & Sign Out"</p>	
--	--	--

V. PHOTOGRAPHS



ORANGE COUNTY - 23330 Moulton Parkway

August 11, 2008



(FNS Observation) Right pathway route to main door, was 47" wide (should be 48")



(FNS Observation) Left pathway route to main door, was 47" wide (should be 48")



ORANGE COUNTY – 115 Columbia, Aliso Viejo
(August 11, 2008)



Freestanding sign height (80"), proper signage?
(1st view)

Freestanding sign obscured by tree



Freestanding sign height (80"), proper signage?
(2nd view)

Freestanding sign obscured by tree



Freestanding sign height (80")
(1st View)

Sign was not at appropriate height – was at 75"



Freestanding sign height (80")
(2nd View)

Sign was not at appropriate height – was at 75"



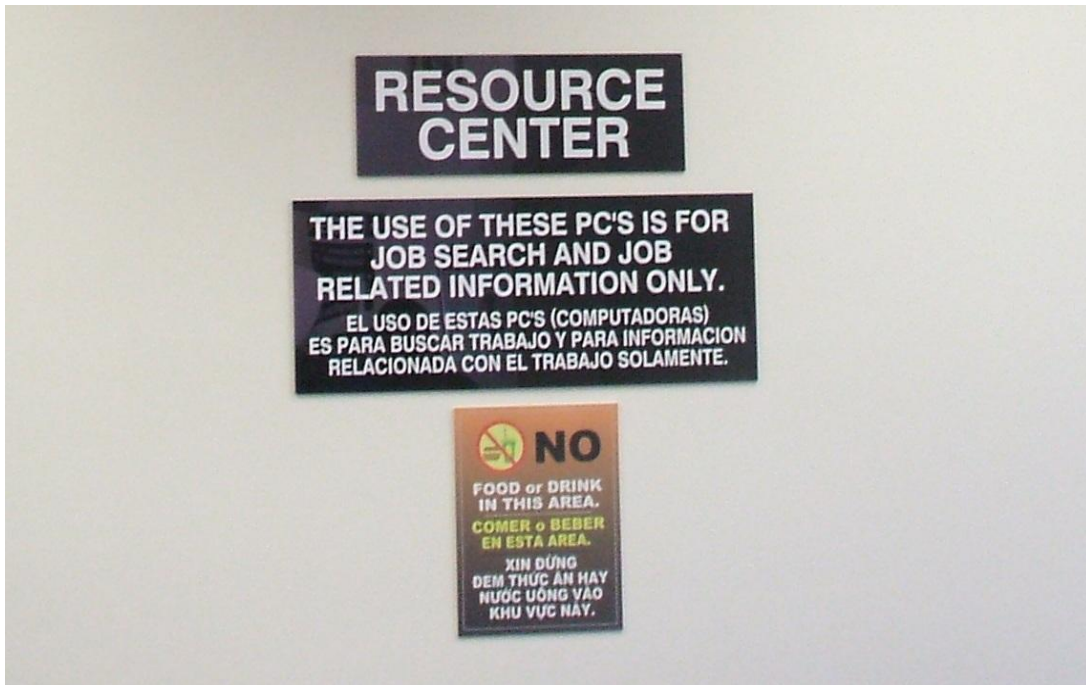
**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Language**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Language**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Language**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Language**



1505 E. WARNER

(August 11, 2008)



**A clearance access aisle on passenger side of van
space is blocked by a building structural column**

(3rd Disabled parking spot from the left side, facing the building)



There was no directional sign directing clients to the main entrance from the furthest location in the parking lot structure.



Signage on pavement depicting a wheelchair w/occupant needs to be repainted



A sidewalk obstruction is visible on the access aisle in front of the building.

**Two (2) bushes need to be cut back from the building
to eliminate obstruction of travel**



The ramp leading to the front of the building
needs to have railings on each side.
Railings were not available on the left side going up the ramp.
(1st view)



The ramp leading to the front of the building
needs to have railings on each side.
(2nd view)



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Language**



1337 W. Braden Court
(August 13, 2008)



Freestanding sign must be at a height of 80"
Sign was 59" in height
(1st view)



Freestanding sign must be at a height of 80"
Sign was 59" in height
(2nd view)



Signage on pavement needs to be repainted
(1st View)



**Signage on pavement needs to be repainted
(2nd View)**



**Signage on pavement needs to be repainted
(3rd View)**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages (Hours of Operation)**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages



DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages



ORANGE COUNTY – 6100 Chip Avenue
(August 14, 2008)



(1st View)

- Person with disabilities forced to go behind cars? (YES)
(CA T24 1129B.4.3)
- Do access aisles connect to the accessible path of travel? (NO)
(CA T24 1129B.4.3, ADA 4.6.3) p. 136

- Is parking located as close as possible to entrance? (NO)
(CA T24 1129B.1.2., ADA 4.3.2 (1) p. 131)
- Directional signage to accessible entrance, if not main entrance?
(NO directional signage to direct clients to front entrance)

(CA T24 1127B.3, ADA 4.1.3 (16B), CA T24 1117B.5.8.1.2) pp. 183, 353

This parking is in the rear side of the building. Clients have to go behind numerous parking spots on the side of the building to get to the front entrance. There is no clear path of travel and no access aisle to the front entrance. The sidewalk seen in the photograph is not used to access entry into the building for clients.

There are no directional signs pointing clients to the front entrance.



(2nd View)



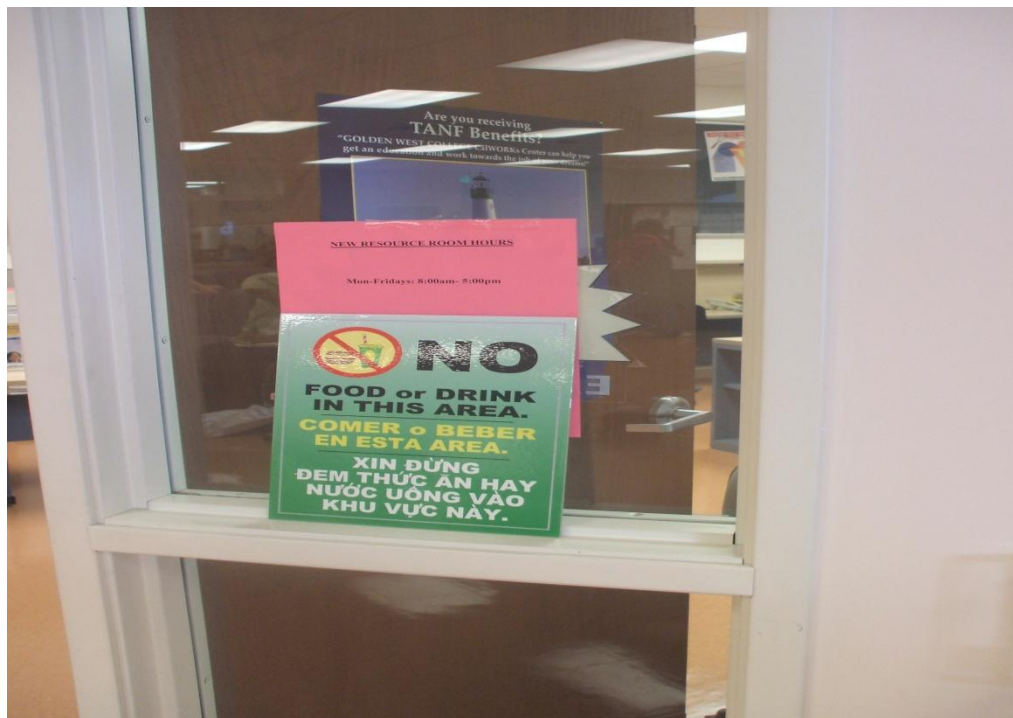
**Two free-standing signs were at 77" in height.
(Must be at 80" from base of pole.)**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



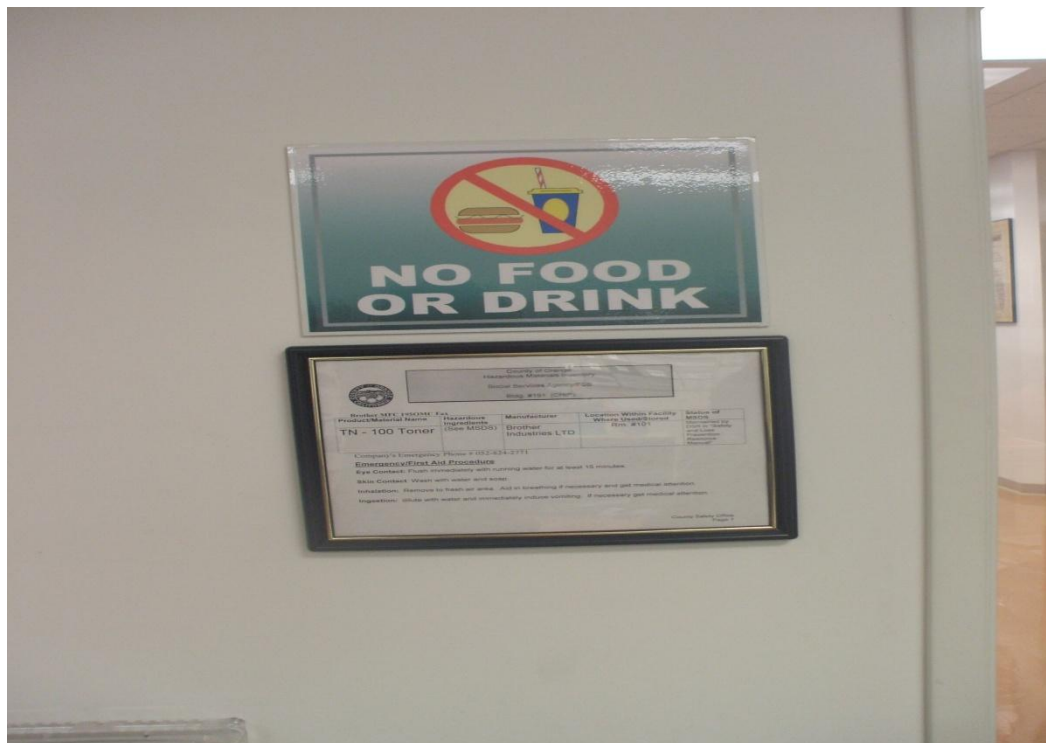
**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



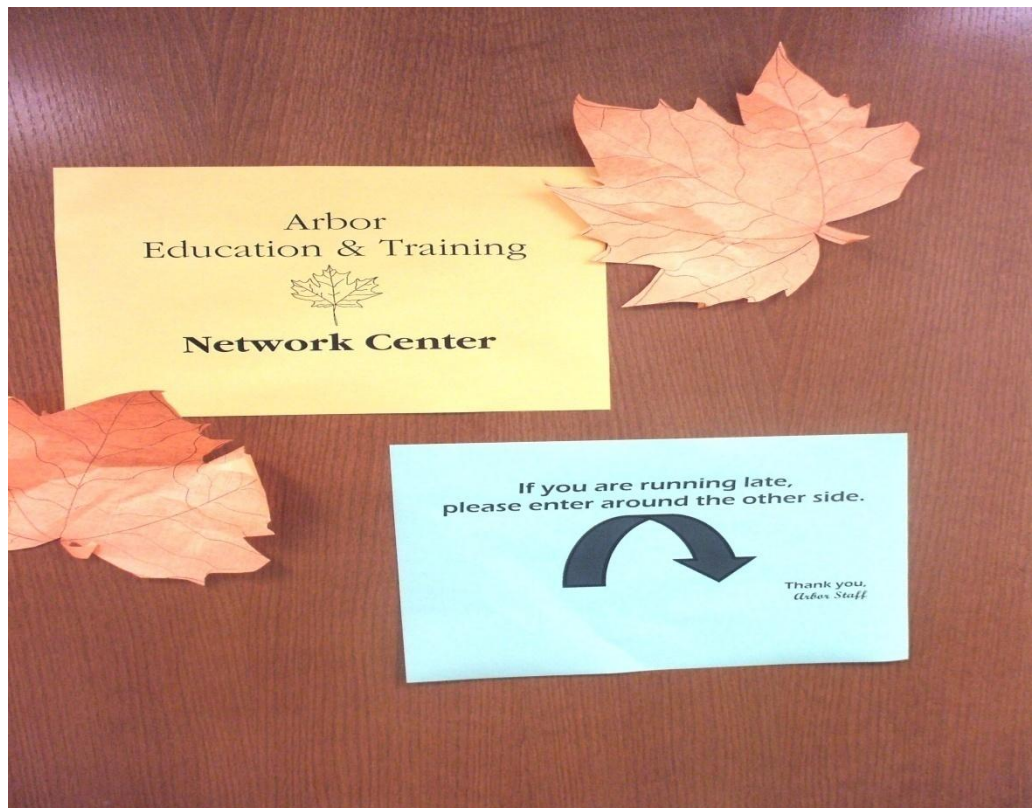
**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages



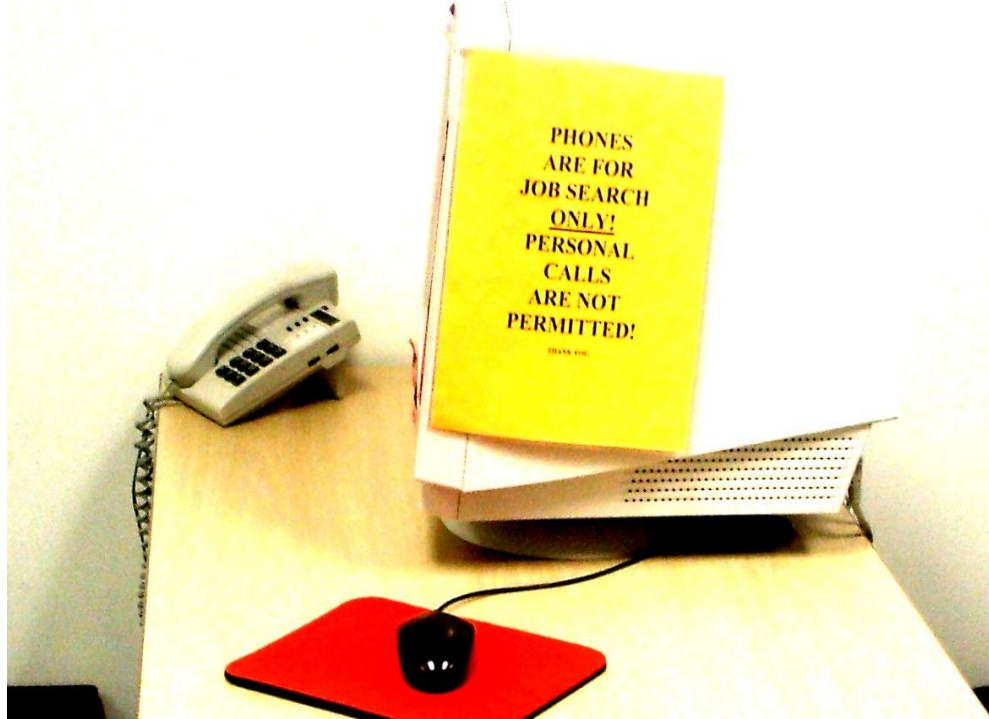
DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages



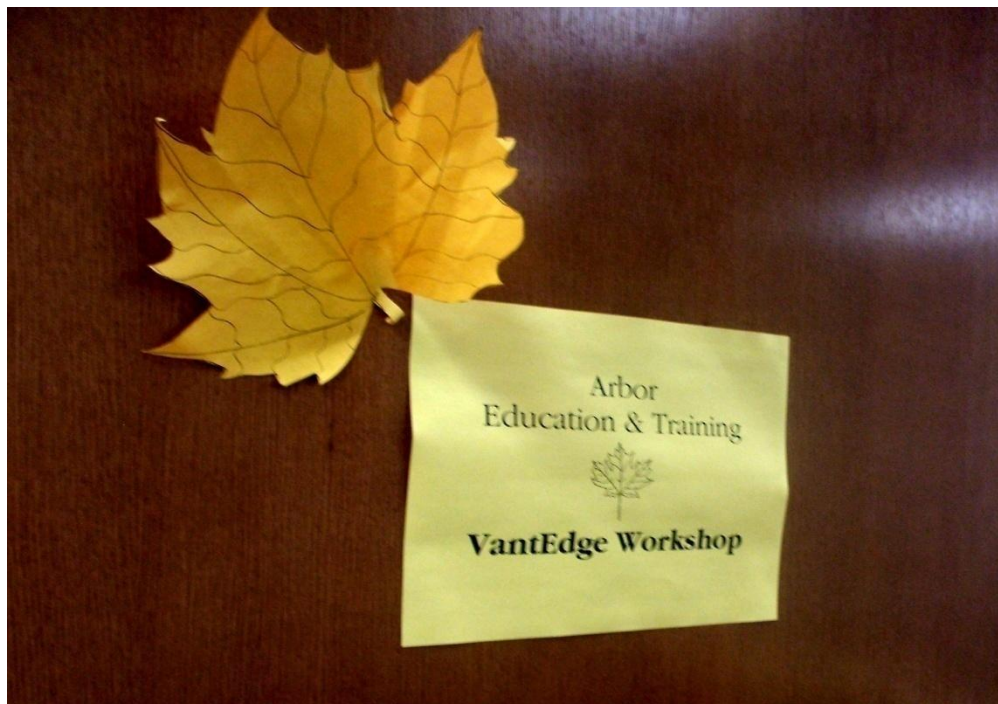
DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages



DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages



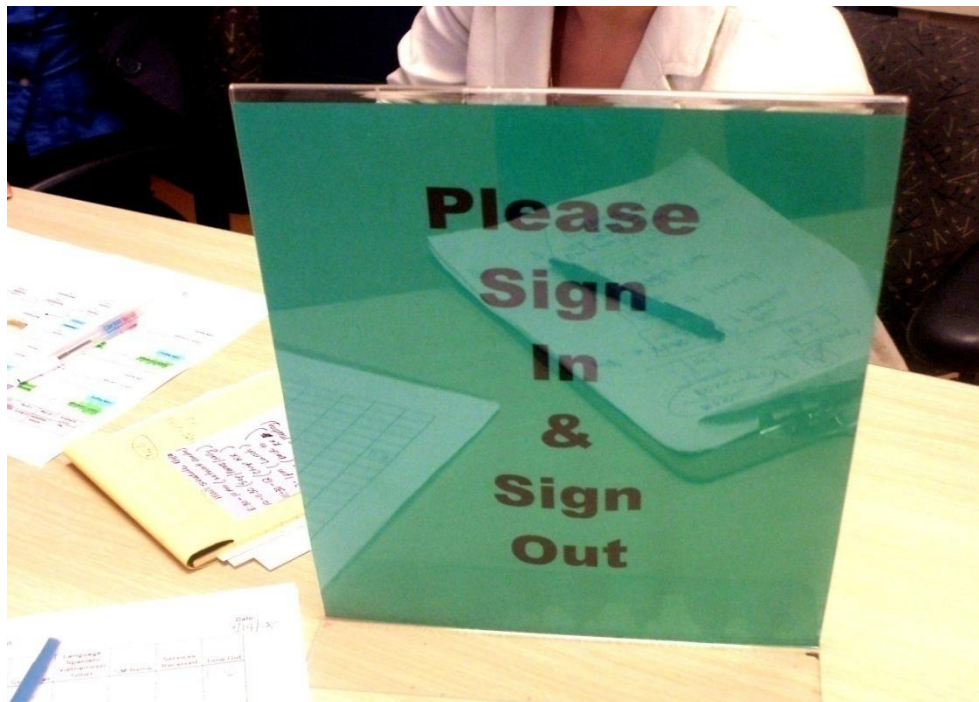
**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



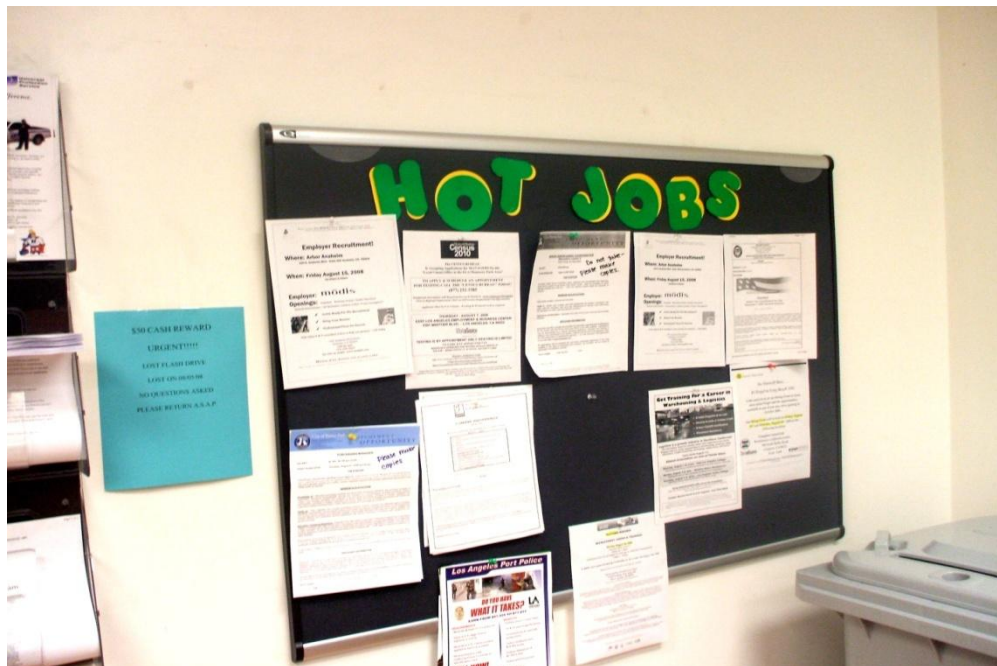
DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages



DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**



**DIRECTIONAL & INFORMATIONAL SIGNAGE
Not Available in Threshold Languages**

VI. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact?	X			
Does the county use a primary language form?	X			

Question	Yes	No	Some-times	Comments
Does the client self-declare on this form?			X	Orange County uses an online stamp that identifies language preference. A F063-02-12 form Reception Referral form (which self declares language preference) was seen only in the Chip Office.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			
Is there a delay in providing services?	X			
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			Tele-Language Service is utilized when needed.
Are county interpreters determined to be competent?	X			Orange County interpreters are certified.
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?		X		Staff was unaware of a County Policy, but most are informed not to allow anyone under 18 to be used as an interpreter.
Does the county allow the client to provide his or her own interpreter?	X			

Question	Yes	No	Some-times	Comments
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?				Orange County staff do ensure clients are aware of the possibility of unclear interpretation - when a client-provided interpreter is used. Client is required to sign a Release of Confidentiality statement.
Does the county use the CDSS-translated forms in the clients' primary languages?		X		Several CDSS forms were not used. In several reviewed cases: <u>Columbia was not consistently using:</u> QR 377.4, DFA 377.5, Temp NA 1232, QR 377.1, and QR2 <u>Chip was not consistently using:</u> QR-2, QR 377.1, Temp 2215,CW 2.1, M40-17, CW2.1
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			

Question	Yes	No	Some-times	Comments
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			
Is the client identified as having a learning disability referred for evaluation?	X			

B. Corrective Actions

Area of Findings	Corrective Actions
Written Materials	Orange County must use and provide translated forms, to include translated notice of action forms, in the clients' primary languages when translated by CDSS. Div. 21-115.2

VII. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Food Stamps	APS	C&FS	CalWORKS Food Stamps
Ethnic origin documentation	Info. in CALWIN	Info. in SOC 341 and SOC 95	Info. in CWS/CMS	Info. in CALWIN

Documented Item	Food Stamps	APS	C&FS	CalWORKS Food Stamps
Primary language documentation	Info. in CALWIN	Info. in SOC 341 and SOC 295	Info. in CWS/CMS	Info. in CALWIN
Method of providing bilingual services and documentation	<p>Interpreters are available and this office frequently utilizes Tele-Language to deliver interpretation.</p> <p>Bilingual workers were not consistent in completing documentation of their role as the interpreter. There were some cases with appropriate entry in the case comments, but many cases had no documentation that language services were provided.</p>	<p>Interpreters are available and this office frequently utilizes Tele-Language to deliver interpretation.</p> <p>Bilingual workers were not consistent in completing documentation of their role as the interpreter. There were some cases with appropriate entry in the case comments, but many cases had no documentation that language services were provided.</p>	<p>Interpreters are available and this office frequently utilizes Tele-Language to deliver interpretation.</p> <p>Bilingual workers were not consistent in completing documentation of their role as the interpreter. There were some cases with appropriate entry in the case comments, but many cases had no documentation that language services were provided.</p>	<p>Interpreters are available and this office frequently utilizes Tele-Language to deliver interpretation.</p> <p>Bilingual workers were not consistent in completing documentation of their role as the interpreter. There were some cases with appropriate entry in the case comments, but many cases had no documentation that language services were provided.</p>

Documented Item	Food Stamps	APS	C&FS	CalWORKS Food Stamps
Client provided own interpreter	Staff indicated that notation would be provided in case comments; however, documentation not evident in cases sampled.	Staff indicated that notation would be provided in case comments; however, documentation not evident in cases sampled.	Staff indicated that notation would be provided in case comments; however, documentation not evident in cases sampled.	Staff indicated that notation would be provided in case comments; however, documentation not evident in cases sampled.
Method to inform client of potential problem using own interpreter	When asked if clients are advised of potential problems, staff indicated it was being done – there was no evidence of documentation in the files.	When asked if clients are advised of potential problems, staff indicated it was being done – there was no evidence of documentation in the files.	When asked if clients are advised of potential problems, staff indicated it was being done – there was no evidence of documentation in the files.	When asked if clients are advised of potential problems, staff indicated it was being done – there was no evidence of documentation in the files.
Release of information to Interpreter	Orange County utilizes a release of information sheet.	Orange County utilizes a release of information sheet.	Orange County utilizes a release of information sheet.	Orange County utilizes a release of information sheet.
Documentation of minor used as interpreter	In review of case files, there was no evidence of minors used as interpreters.	In review of case files, there was no evidence of minors used as interpreters.	In review of case files, there was no evidence of minors used as interpreters.	In review of case files, there was no evidence of minors used as interpreters.
Documentation of circumstances for using minor interpreter temporarily	N/A	N/A	N/A	N/A
Method of identifying client's disability	No document was evident in the case file to identify disabilities.	No document was evident in the case file to identify disabilities.	No document was evident in the case file to identify disabilities.	No document was evident in the case file to identify disabilities.

Documented Item	Food Stamps	APS	C&FS	CalWORKS Food Stamps
Method of documenting a client's request for auxiliary aids and services	No document was evident in the case file to identify disabilities.	No document was evident in the case file to identify disabilities.	No document was evident in the case file to identify disabilities.	No document was evident in the case file to identify disabilities.

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter.	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
Documentation that bilingual services were provided.	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22

VIII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			

Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	X			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

IX. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			
Did the employees know who the Civil Rights Coordinator is?	X			

Interview and review areas	Yes	No	Some-times	Findings
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

X. CONCLUSION

The CDSS found the County of Orange Social Service Agency in satisfactory compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. The civil rights program was visible in the main reception areas with translated signage and an overall “climate” of participant service. Staff reflected a commitment similar to that expressed by management with respect to ensuring access and assistance.

Although the offices visited in Orange County are providing appropriate client support, there remain issues with documentation of language services by bilingual workers. Other documentation issues have been addressed and upon implementation of newly published procedures outlined in Policy Implementation Memorandum No. 08-04, these issues will be resolved.

It should be noted that there was, once again, exceptional cooperation and coordination provided by the Civil Rights Coordinator and the district staff throughout the review. The reviewer was able to discuss the findings with district supervisory staff and found them to be both receptive and informative.

The County of Orange Social Service Agency must remedy the violations that were identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the violations.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.